



Office of the Secretary  
445 12<sup>th</sup> Street, SW,  
Federal Communications Commission  
Washington, DC 20554

Reference: **PS Docket No. 14-148**

I am writing this letter in support of ACD Telecom's request to be certified as a frequency coordinator for Part 90 public safety frequencies. Frankly, this is in line with the Federal Communications Commission's efforts in promoting efficiency and competitive frequency coordination process as mentioned in FCC Docket 14-148.

Based on my experience with ACD Telecom, I will simply respond to three (3) of the criteria delineated in FCC Docket 14-148:

- (a) **Representativeness of the users of the frequencies to be coordinated;** ACD's core capabilities, qualifications and passion is public safety communications. That is all they work with and represent. ACD Telecom has been performing frequency coordination in public safety bands since 1998. Furthermore, their senior management has performed frequency coordination in FCC Part 90 public safety bands for over 29 years.
- (b) **The entity's overall coordination plan (including how recommendations would be made and equality of applicant treatment);** ACD has always demonstrated their fairness and equal treatment. As a public safety provider, I know they are very fair in their treatment of the applicants.
- (c) **The entity's experience coordinating frequencies in the service or technical expertise;** ACD Telecom staff, in particular their senior management have extensive experience in frequency coordination in public safety bands. They are the pioneer in the Electronic Batch Filing (EBF) process, National Public Safety Planning Advisory Committee (NPSPAC) and National Coordination Committee (NCC). They have RF engineers with extensive public safety background and knowledge of TIA TSBB-88 who perform frequency coordination, that's more than I can say for other coordinators. I have been very impressed with their ability to explain technical and regulatory items in a way that is very easy to understand.

I am convinced that as a frequency coordinator for part 90 public safety frequencies, ACD Telecom will show exceptional technical competency, FCC and FAA rules and regulations and customer service. By certifying ACD Telecom as frequency coordinator, the competitive process will make the whole frequency coordination more efficient, lower the cost and improve the speed of service.

If you have any questions please call 610-383-8768 or E Mail [Leo\\_scaccia@chs.net](mailto:Leo_scaccia@chs.net).

Sincerely,

Leo R. Scaccia III, RN, BS, NREMT-P  
Director, Pre-Hospital Services